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*Attorneys for Defendant San Diego County Credit Union*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HEATHER WULLNER,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES  
LLC; KINECTA FEDERAL CREDIT  
UNION; MECHANICS BANK FKA CRB;  
and SAN DIEGO COUNTY CREDIT  
UNION,

Defendants.

Case No. 2:19-cv-01735-APG-VCF

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO THE  
COMPLAINT**

**(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Heather Wullner and Defendant San Diego County Credit Union (“SDCCU”) submit this stipulation requesting that the Court issue an order extending SDCCU’s deadline to respond to the Complaint by 28 days, such that SDCCU shall respond on or before December 3, 2019. This is the first stipulation for extension of time to respond to the Complaint.

The parties are requesting the extension because one of the lead attorneys working on this case will be traveling throughout the month of November, including traveling out of the country from November 14 through November 27, 2019. Further, November 28, 2019 is Thanksgiving. SDCCU will need more time to investigate the facts before responding to the Complaint.

The parties agree that without an extension, SDCCU's deadline to respond to the Complaint is November 5, 2019. The parties request that this deadline be extended by 28 days so that SDCCU shall respond to the Complaint by no later than December 3, 2019.

In exchange, Plaintiff's counsel has requested that SDCCU's counsel participate in a Rule 26(f) conference in the next two weeks. SDCCU's counsel agrees to participate in the Rule 26(f) conference, but the parties agree that any participation in the Rule 26(f) conference shall not waive any right by SDCCU to compel arbitration in this case or any right to request a stay pending arbitration.

Dated: November 5, 2019

KNEPPER & CLARK LLC

By: /s/ Shaina R. Plaksin  
Shaina R. Plaksin, Esq.  
Nevada Bar No. 13935  
5510 S. Fort Apache Rd., Suite 30  
Las Vegas, NV 89148  
*Attorney for Plaintiff Heather Wullner*

Dated: November 5, 2019

SNELL & WILMER L.L.P.

By: /s/ Paul Swenson Prior  
Paul Swenson Prior  
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Las Vegas, NV 89169  
*Attorneys for Defendant San Diego County  
Credit Union*

**ORDER**

After considering the parties' Stipulation for Extension of Time to Respond to the Complaint (First Request), the Court hereby GRANTS the extension stipulated by and between Plaintiff Heather Wullner and Defendant San Diego County Credit Union ("SDCCU") so that the time for SDCCU to respond to the Complaint shall be extended to and include December 3, 2019.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 11-5-2019

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED November 5, 2019.

/s/ Maricris Williams

An employee of SNELL & WILMER L.L.P.

4822-0681-5148